

1 GILADI

2 September of 1987 I had injury home and I
3 underwent surgery by his friend
4 Dr. Goldstein from Einstein. After
5 physical examination, he refer me to
6 Dr. Berg for electronic testing, for EMG
7 to find out what was going on.

8 Q. Is it correct that the original
9 of this page from your testimony was
10 destroyed in the flood, to your
11 knowledge?

12 A. That's correct.

13 Q. When was the last time that you
14 remember seeing the original of this
15 page?

16 A. I really do not recall.

17 Q. The first note you said is dated
18 Friday, March 1991?

19 A. There is two notes copied
20 together.

21 Q. The top note that you first
22 read, you said was dated Friday, March
23 1991. Do you have any recollection of the
24 date in March?

25 A. After the examination, maybe the

1 GILADI

2 day of the examination. I do not know.

3 Q. Which note was chronologically
4 written first?

5 A. As I said, it is two notes put
6 together for the Xerox. It is two
7 separate notes.

8 MR. DINHOFER: The question was
9 which one was written first, the top one
10 or the bottom one.

11 A. The lower one.

12 Q. Just so I understand you
13 correctly, is it correct then that these
14 notes were two different pages, sheets of
15 paper?

16 A. That's correct.

17 Q. And the one on the bottom from
18 February was written first?

19 A. Correct.

20 Q. Who referred you to
21 Dr. Strauch?

22 A. Dr. Hall.

23 Q. H-a-l-l?

24 A. That's correct.

25 Q. Is Dr. Hall affiliated with

1 GILADI

2 Montefiore or Einstein?

3 A. He used to work with

4 Dr. Strauch.

5 Q. Is Dr. Hall a plastic surgeon?

6 A. That's correct.

7 Q. Had you ever seen Dr. Hall as a
8 patient?

9 A. No.

10 Q. You knew Dr. Hall from your
11 professional work at Einstein?

12 A. That's correct.

13 Q. Are there any notes that you
14 have copies of that were written before
15 February 25, 1991?

16 A. With regard to Dr. Strauch?

17 Q. Anything that you have provided
18 us with copies.

19 MR. DINHOFER: Are any of these
20 notes that comprise Exhibit B written
21 prior to this note?

22 A. I don't think so, no.

23 Q. Why don't you look through them
24 just to --

25 MR. DINHOFER: Take a look

1 GILADI

2 through them real quickly just to verify
3 whether there is any of them dated before
4 this note.

5 (Pause.)

6 A. No.

7 Q. Are these the only notes, and
8 when I say these, I am referring to the
9 entire Defendants' Exhibit B, that exist
10 that contain any mention of complaints
11 that you had with respect to your left arm
12 or hand? Did you ever write any other
13 notes that related to pain in the left
14 hand or arm?

15 A. Pain in my left elbow. You are
16 talking about pain in my left hand?

17 Q. Or elbow or arm. Did you ever
18 keep any other notes other than what we
19 have here in just Defendants' Exhibit B?

20 A. Not that I recall.

21 Q. What was significant to you that
22 prompted you to write the note of February
23 25, 1991?

24 A. The situation of September '87
25 injury that I was being questioned on that

1 GILADI

2 issue, and I just want to make a note to
3 myself what I said and what was being
4 told.

5 Q. What was significant to you
6 about being questioned about the 1987
7 injury?

8 A. Because I came with complaints
9 because when I am working for a long
10 period of time I have pain in my three
11 fingers, and I didn't think it was related
12 to my injury of 1987.

13 Q. The September of 1987 injury was
14 to the same arm, correct?

15 A. That's correct.

16 Q. Did you write any note at any
17 time in 1987 about that injury or about
18 the surgery in 1987?

19 A. No.

20 Q. Did you ever write any notes
21 before February of 1991 having to do with
22 your left hand or arm?

23 A. As I said, not that I recall
24 that I had. No.

25 Q. I am not asking if you have. I

1 GILADI

2 am just asking if you ever wrote any.

3 A. I do not recall.

4 Q. When you and your brother found
5 the copies of these notes that have been
6 produced here, were these among other
7 notes that were in the same pile, the same
8 grouping?

9 A. As I said before, I did not find
10 them with my brother. My brother
11 independently found them when I was asking
12 to look through my record.

13 Q. Were you present when he found
14 them?

15 A. No. As I explained to you, I do
16 not know from where and which.

17 Q. Were these, and when I say
18 these, I am referring to Defendants'
19 Exhibit B were these the only pages he
20 presented to you or were there others?

21 A. That's correct.

22 Q. Let's go to the second sheet.
23 Maybe we should compare to make sure we
24 are talking about the same sheet.

25 A. I would like to clarify

1 GILADI

2 something --

3 MR. DINHOFFER: Wait until she
4 asks a question.

5 MS. ATLAS: Mark this as D 2.

6 (Defendants' Exhibit D 2 marked
7 for identification.)

8 Q. Can you read that verbatim,
9 please?

10 A. Okay. July 19, 1991. I revisit
11 Dr. Strauch in order to get some
12 information about the test that I had in
13 March by Dr. Berger. During our
14 conversation, Dr. Strauch told me that I
15 have pressure on my -- on ulna nerve and
16 median nerve on both hands. He raised the
17 opportunity that I may need to go for
18 surgery to release the ulna nerve and in
19 the wrist, but before that he would like
20 to do some testing by injecting steroid,
21 and, if this not going to help, I will
22 need to go for surgery. I signed on form
23 that I willing to have the procedure, and
24 during the procedure the nurse was in the
25 room.

1 GILADI

2 Q. Is that it?

3 A. That's correct.

4 Q. Did Dr. Strauch tell you
5 anything further on that visit, on that
6 date about the surgery, what it would
7 consist of?

8 A. He said he doesn't know, but he
9 think I should have the surgery for my
10 wrist. This is only way he is going to do
11 the steroid injection.

12 Q. What did he tell you about the
13 surgery? What, if anything, did he tell
14 you at that time?

15 A. Nothing.

16 Q. Did you ask him what type of
17 surgery he was talking about?

18 A. It was not -- no, it was not an
19 issue that I am going to -- He said I
20 may. So if I may, I am not going to ask.

21 Q. You said that Dr. Strauch told
22 you that you had pressure on both hands,
23 the nerves on both hands; is that
24 correct?

25 A. That's correct.

1 GILADI

2 Q. Did he ever recommend surgery on
3 both arms?

4 A. No.

5 Q. Did he ever discuss --

6 MR. DINHOFFER: Are you talking
7 about on the occasion --

8 MS. ATLAS: On this visit.

9 A. No, he said only on my left, and
10 he said only for my wrist.

11 Q. Did he tell you the status of
12 the nerves on your right hand or arm?

13 A. No, we did not even discuss the
14 issue. He said that I have pressure on
15 both hands. He said you have bilateral
16 something, carpal tunnel syndrome.

17 Q. He said you have bilateral --

18 A. He said you have bilateral
19 pressure on the nerve, something like
20 that. I don't remember word by word.
21 What I have in front of me, that is what I
22 remember.

23 Q. Can you describe the nurse who
24 was in the room on that date?

25 A. Yes, she is -- I think she had

1 GILADI

2 dark hair. She is not tall, and she is
3 not fat.

4 Q. Do you know her name?

5 A. No, I do not recall.

6 Q. Can you tell me if she was a
7 young woman or middle-aged?

8 A. She was middle-aged.

9 Q. Did she say anything during the
10 time you were with Dr. Strauch?

11 A. No.

12 Q. Did Dr. Strauch inject your
13 hands, your wrist with steroids?

14 A. I turn my head, so I do not
15 know, but I got --

16 Q. Did he give you some type of
17 injection?

18 A. Yes, he did.

19 Q. How many times either on this
20 visit or subsequent to this visit did he
21 inject you?

22 A. The only -- that is the only
23 time he injected.

24 (Nothing about joking, fix
25 that).

1 GILADI

2 MS. ATLAS: Let's mark the next
3 page.

4 (Defendants' Exhibit D 3 marked
5 for identification.)

6 Q. Go ahead.

7 A. July 31, 1991. On my regular
8 visit today with Dr. Strauch, I told him
9 that I have some improvement. He told me
10 that I have to wait a few months, and, if
11 there was no further improvement, I should
12 return to him for surgery on my wrist.

13 Q. Again, did you discuss with him
14 at this time this proposed surgery?

15 A. No. This visit was a few
16 seconds, a few minutes. It was not --

17 Q. The copy of the paper that you
18 have that has been marked as D 3 appears
19 to be written on a piece of paper that was
20 cut off in the middle. Was there anything
21 written on the bottom of that page?

22 A. Maybe something related to
23 work.

24 MR. DINHOFFER: Do you have any
25 specific knowledge of what was written or

1 GILADI

2 are you guessing?

3 THE WITNESS: No..

4 MR. DINHOFER: Don't guess..

5 A. I do not remember..

6 Q. Was there something else written
7 on this page?

8 MR. DINHOFER: Do you know
9 whether there was something written on the
10 bottom of this page?

11 A. No, I do not.

12 Q. In general, looking at these
13 records, did you go through what your
14 brother gave you and take out certain
15 things, other than other notes that you
16 felt might not be related to this case?

17 A. No, I did not.

18 Q. So what has been produced as
19 Defendants' Exhibit B and what we are
20 marking here, this is the sum total of
21 what your brother gave you?

22 A. That's correct.

23 Q. When you asked your brother to
24 look for records, did you ask your brother
25 to pull or take only those records that

1 GILADI

2 had to do with your care in this case?

3 A. I do not recall what I told him
4 on the phone when I was being told, and I
5 do not recall what my brother did or my
6 family did.

7 Q. Did you ask your brother to look
8 for these records?

9 A. I was being told that I need to
10 produce it to the court by my attorney.

11 Q. What were you told needed to be
12 produced?

13 A. I need to produce --

14 MR. DINHOFER: No, what I told
15 him is objectionable. This is a
16 privilege. Come on.

17 Q. Then tell me what you told your
18 brother.

19 A. I told my brother I need some
20 records to -- to go through my records and
21 to see -- I do not recall. As I said, it
22 was a long time ago. It was almost year.
23 I do not know. A few months went by. I
24 do not recall.

25 Q. These records were provided to

1 GILADI

2 us in October. When did you tell your
3 brother to produce these records?

4 A. When my lawyer told me that I
5 have to produce some record after my
6 deposition.

7 Q. And you have no recollection at
8 all what you told your brother you needed
9 to get?

10 A. We talk about a lot of things.
11 I do not talk only about my -- this
12 current situation.

13 Q. Does your brother live in
14 Israel?

15 A. All my family lives in Israel.
16 I think at that time I spoke with my
17 mother and also -- I do not know who I
18 spoke with. As I said, I spoke with my
19 family.

20 Q. Were these records in your
21 mother's home or apartment?

22 A. I really do not -- I think in my
23 mother's home, I think in my brother's.
24 Wherever I had space I put stuff.

25 Q. You do not know where the --

1 GILADI

2 A. The original of this one.

3 Q. -- original or copies of any
4 papers --

5 A. As I said, I shipped everything
6 to Israel, and they did what they felt
7 comfortable with my stuff because I am not
8 there, and I do not know what they do. I
9 have stuff --

10 Q. You have no idea where your
11 personal papers are in Israel? They could
12 be anywhere.

13 A. With my family.

14 Q. But you have no idea where?

15 A. I am not looking for them. I do
16 not know where at the moment.

17 Q. Do you keep any of your personal
18 papers in the United States?

19 A. The only things I have is only
20 since I came back from Israel.

21 Q. When was that?

22 A. It was in 1994.

23 Q. You haven't been to Israel since
24 1994?

25 A. No. No. I was in Israel for a

1 GILADI

2 long period of time.

3 Q. My question was: Do you keep
4 any personal papers in the States; any
5 notes that you keep, do you keep any of
6 them in the States?

7 A. From what period? From what?

8 Q. Any notes, any notes that you
9 have taken since 1990 to the present.

10 MR. DINHOFER: Related to this
11 case.

12 A. As I said originally, everything
13 I had in my possession until November of
14 1993, they are not in the United States.

15 Q. Do you still take notes relating
16 to any complaints you might have about
17 your hands or your arm or medical
18 treatment you are receiving? Do you still
19 take notes?

20 A. No, I am not taking notes about
21 that anymore.

22 Q. When was the last time you wrote
23 any notes having anything to do with
24 medical care or physicians you have spoken
25 to or visited?

1 GILADI

2 A. I think it was in April of --
3 before I went to Israel in 1993.

4 Q. Since April 1993 up to the
5 present, you haven't written any notes
6 having anything to do with medical care or
7 treatment or complaints you may have?

8 A. I do not recall that I did.

9 Q. Was there a specific reason you
10 stopped writing these notes after April
11 1993?

12 A. I felt -- I was having other
13 things in my head, and that I -- I do not
14 recall why.

15 Q. Let's go to the next page.

16 MR. DINHOFER: Which page?

17 MS. ATLAS: Let me see your
18 page.

19 (Defendants' Exhibit D 4 marked
20 for identification.)

21 Q. Looking at D 4, this appears to
22 be a page ripped or clipped from a
23 notebook or spiral notebook; is that
24 correct?

25 A. That's correct.

1 GILADI

2 MR. DINHOFER: As are D 2 and D

3 3.

4 Q. Were there any other notes that
5 were written on this page?

6 A. I do not recall.

7 Q. In looking at Exhibit D 4 as
8 provided by your counsel, is this the
9 exact page that was provided to you by
10 your brother?

11 A. I do not understand the
12 question.

13 Q. Is what you are looking at that
14 was marked as D 4 the exact page of what
15 was provided to you by your brother?

16 A. Is this the copy I received? I
17 do not know if this is exactly the same
18 page, but this is what I got.

19 Q. Did your brother or did you ever
20 ask your brother if he had made this
21 copy?

22 A. As I said, originally, maybe. I
23 did everything before I shipped the
24 stuff. Maybe my brother did. I do not
25 know who made the copies. I do not recall

1 GILADI

2 which copies I made, which copy he made.

3 If he ever did, I do not know.

4 Q. So I understand, you wrote the
5 note in the United States. You made the
6 copy in the United States and shipped the
7 original and the copy to Israel?

8 MR. DINHOFER: That is not what
9 he said.

10 A. That is not what I said.

11 Q. Tell me when you made the copy.

12 A. I said before I shipped stuff
13 overseas, a few things that were relevant
14 to me that were not going to be damaged
15 that were important, I made copy or I made
16 copies so, if one disappear, the other one
17 will exist.

18 Q. So you made copies in the United
19 States?

20 A. I do not recall which pages I
21 made and which I didn't made. To my
22 recollection, I think I made copies, and I
23 sent it overseas to make it clear.

24 Q. Where did you make the copies?

25 A. On a copy machine.

1 GILADI

2 Q. At Albert Einstein?

3 A. I do not recall where I get the
4 copy.

5 Q. Did you keep any of the copies
6 of these notes in the United States?

7 A. As he said, until -- everything
8 I had until November 1993, everything was
9 in Israel.

10 Q. Can you read the note beginning
11 with the date, please.

12 A. I went to --

13 Q. What is the date, please?

14 A. October 11, 1991. I went to
15 Dr. Strauch, and during the visit
16 Dr. Strauch told me that I have to go for
17 surgery on my wrist to release the median
18 nerve. He also told me that, as I already
19 will be in the operating room, then it is
20 recommended that I will go for surgery on
21 my ulna nerve at the elbow, something that
22 I will need to do in the future. He
23 explained to me that after the surgery, I
24 will be in a cast for three weeks, and
25 after the cast will be removed the

1 GILADI

2 condition of my hand will be the way I was
3 when I was born. I signed on form.

4 Q. I am sorry. The way that you
5 were when you were --

6 A. With no problem. I signed on
7 the form for the surgery because I had
8 difficulty to read the forms due to some
9 problem in my eyes. I asked the doctor,
10 Dr. Strauch, to explain to me what I am
11 signing for, and he told me that this is
12 only a verification that you are giving
13 for us to do the surgery or release that
14 we can go to make the surgery that we just
15 spoke about.

16 Q. Anything else?

17 A. No.

18 Q. You said you had difficulty
19 reading the form because you had a problem
20 with your eyes.

21 A. Yes.

22 Q. What type of problem did you
23 have with your eyes?

24 A. What I had? I had some -- I do
25 not know exactly what the problem I had,

1 GILADI

2 but I know on October 29 I had surgery on
3 my eye.

4 Q. What kind of surgery did you
5 have with your eyes?

6 A. Removal of something from my
7 eye.

8 Q. What was removed from your eye?

9 A. Actually, I do not know. You
10 need to talk with my doctor.

11 Q. Who was the doctor that
12 performed the surgery?

13 A. Dr. Myer.

14 Q. Can you spell that?

15 A. I do not know how to spell it.

16 Q. Where did the surgery take
17 place?

18 A. Montefiore.

19 Q. Was that on the Einstein campus
20 or the Moses campus?

21 A. No, this is at Montefiore
22 Hospital.

23 Q. Was it ambulatory surgery or did
24 you stay overnight?

25 A. Ambulatory.

1 GILADI

2 Q. Which eye was operated on?

3 A. The left eye.

4 Q. Did you have any difficulty with
5 the right eye as of October 11?

6 A. No, I do not have problem with
7 my right eye.

8 Q. And when you looked at the form
9 on October 11 or at the time that
10 Dr. Strauch asked you to sign it, were you
11 able to read any of the words?

12 A. As I said at my deposition, I
13 was able to read. I didn't understand the
14 English, so I asked also -- this is
15 another reason why I asked for the form to
16 be explained to me.

17 Q. You didn't understand the
18 English on the form --

19 A. I said I was trying to read --

20 Q. -- or your eye hurt you?

21 A. It was difficult to me, and I
22 was trying to read, and I did not
23 understand, and he was pushing for me to
24 finish to read it, and I said I cannot
25 read it fast, and I cannot understand, so

1 GILADI

2 I told him to explain.

3 Q. Is the reason you had difficulty
4 because of the eye problem or because you
5 did not understand the English or both?

6 A. I couldn't understand the
7 language.

8 Q. In 1991, how long had you been
9 working in the United States?

10 A. Repeat.

11 Q. As of October 1991, how long had
12 you been working in the United States?

13 A. Nine years, nine and a half
14 years.

15 Q. And in your job, you had to
16 communicate and read things written in
17 English; is that correct?

18 A. No, I did videotaping.

19 Q. I am sorry?

20 A. I did videotaping.

21 Q. You never had to read anything
22 in English as part of your job?

23 A. As part of my job working with
24 the person, he explained to me what he
25 wanted, and I got to know what he wanted.

1 GILADI

2 Q. So you never had to read
3 anything in English as part of your job?

4 A. I read stuff, and, if I didn't
5 understand, the guy would explain to me.

6 Q. What English on the form didn't
7 you understand?

8 A. I really not recall what
9 happened at the time. I said it was a
10 long time ago. I said I had difficulty.
11 I asked from the doctor to read -- to
12 explain to me, and I got a response what I
13 got from the doctor, and this is what I
14 recall.

15 Q. Is there anything in the note
16 that you just read which indicates that
17 you didn't understand English on the
18 form?

19 A. No, I did not say anything on my
20 note that I did not understand the
21 language. As I -- again, this note is for
22 me, not for anybody else.

23 Q. When did you write this note?

24 A. Sometime around October 11 or on
25 October 11. I do not recall.

1 GILADI

2 Q. Did Dr. Strauch explain anything
3 to you with respect to the surgery other
4 than what you have written here?

5 A. No.

6 Q. As of October 11, did you know
7 where on your hand or arm the median nerve
8 was located?

9 A. I didn't understand the
10 question.

11 Q. As of the time you wrote this
12 note, did you know where in your hand or
13 arm the median nerve was located?

14 A. I know that the median nerve is
15 in the area of the wrist, and that ulna
16 nerve is right on the elbow because of
17 doctor -- when he explained to me about
18 the EMG, but that is the only thing I
19 know.

20 Q. After the surgery by
21 Dr. Goldstein in 1987 through the end of
22 October 1991, was the eye surgery the only
23 other surgery you underwent?

24 A. That's correct.

25 Q. As of the date that you saw

1 GILADI

2 Dr. Strauch, which is the subject of this
3 note, did Dr. Strauch explain to you any
4 potential risks or problems that could
5 happen after the surgery?

6 A. He said to me nothing. He said
7 to me the surgery is very simple. Two
8 weeks, and I am back to normal.

9 Q. He used the words "Back to
10 normal"?

11 A. Correct. Meaning, he said, as I
12 said in my note, you will be like you were
13 born, meaning without any problem.

14 Q. Did you ask him any other
15 questions about the surgery?

16 A. He was having no time. He
17 was -- if -- when he finished talking, he
18 just moved to the other room. I didn't
19 have time to talk to him.

20 Q. You remember that
21 independently?

22 A. Most the time this is routinely
23 done.

24 Q. I am asking at the time of the
25 note, the D 4 note, you remember --

1 GILADI

2 A. Put it this way --

3 Q. My question is as of that time.

4 Not most of the time.

5 A. He did not explain to me

6 anything more than what I said.

7 Q. Did you attempt to ask him any

8 other questions as of that time?

9 A. I wait in the room for a few

10 minutes, and he did not come back.

11 Q. Did you ask to see him after

12 that to ask him questions?

13 A. I do not recall if I did or I

14 didn't. I was in the room for a few

15 minutes, and I saw he didn't come back, so

16 I understand that everything is over, so I

17 left.

18 Q. Before the surgery, did

19 Dr. Strauch ever take any pictures of your

20 hand or your arm?

21 A. No.

22 Q. And as of that date in October,

23 what complaints were you having with

24 respect to your left wrist or your left

25 arm?

1 GILADI

2 A. The only things, the only
3 complaint I had is that I have some
4 difficulty -- pain. It is not -- pain
5 after long working in my finger 1, 2, and
6 3, which is from the thumb to the middle
7 finger.

8 Q. When you were working?

9 A. After prolonged time of work.

10 Q. Did you have any numbness in any
11 part of your hand or arm during that
12 time?

13 A. If I had anything, I had only
14 from finger 1, 2, and 3, from the thumb to
15 the middle.

16 Q. Do you remember if you had any
17 numbness?

18 A. I do not recall. I do not
19 recall.

20 Q. Would that have been something
21 significant that you might have noted in
22 one of your notes, if you had numbness?

23 A. If I had numbness, yes, I would
24 put in my note, if I had something very
25 special.

1 GILADI

2 Q. Did Dr. Strauch ever discuss
3 with you having surgery on your right hand
4 or arm?

5 A. When?

6 Q. As of this visit.

7 A. No.

8 Q. Did you ever discuss with
9 Dr. Strauch the option of having surgery
10 on your right hand or arm?

11 A. No, I trust him, and whatever he
12 said I just followed it.

13 Q. Has any doctor up until the
14 present recommended surgery on your right
15 hand or arm?

16 A. I did not see any doctor.

17 Q. That is not the question. Has
18 any doctor --

19 A. On my right hand, no.

20 Q. I note today you are wearing a
21 brace on your right hand and arm. Did
22 someone prescribe that brace on your right
23 hand and arm?

24 A. Yes.

25 Q. Who is that?

1 GILADI

2 A. Dr. Popesco from physical
3 therapy.

4 Q. Doctor who?

5 A. Popesco. You have my note.

6 Q. When did she prescribe or give
7 you that brace?

8 A. I believe July or August of
9 1993.

10 Q. Did she also give you the brace
11 that you are wearing on your left arm?

12 A. She gave me both at the same
13 time.

14 Q. I am sorry. You said December
15 or July of 1993?

16 A. I said July or August. I do not
17 recall exactly.

18 Q. And since July or August of
19 1993, have you worn those braces on your
20 hands or on your arms continuously?

21 A. Most of the time.

22 Q. Do you wear them every day?

23 A. Yes. I wear them every day. I
24 say most of the time I wear it. When I am
25 taking a shower, I am not wearing it.

1 GILADI

2 Q. Other than when you are going to
3 get the hand wet in the shower, for
4 example, you wear it every day?

5 A. I have to do also some working
6 on my muscles. I take it off when I need
7 to do some treatment for my hand, exercise
8 for my hand.

9 Q. Other than when you are
10 exercising the hands and when you are
11 showering, you wear this continuously, the
12 braces?

13 A. That's correct.

14 Q. Yes?

15 A. That's correct. Sometime -- I
16 had a period that the doctor told me to
17 take one of them off to see how this was
18 working.

19 Q. When was the last time you saw
20 Dr. Popesco?

21 A. I believe it is November of
22 1993.

23 Q. Are you currently under the care
24 of an orthopedic surgeon for either one of
25 your arms?

GILADI

1

2

A. At the present time?

3

Q. Yes.

4

A. Dr. Goldstein.

5

Q. Is that Dr. Goldstein in

6

Manhattan?

7

A. No.

8

Q. Which Dr. Goldstein is this?

9

A. From Manhattan.

10

Q. That is what I said.

11

Has Dr. Goldstein advised you to

12

wear the braces on your hands and arms?

13

A. I went to him already. I had

14

it, so he did not say anything, just --

15

Q. Has Dr. Goldstein rendered care

16

to you for either one of your hands or

17

arms?

18

A. I do not understand the

19

question.

20

Q. The care you are receiving from

21

Dr. Goldstein, does that relate to either

22

one of your arms or hands?

23

A. It is related to my carpal

24

tunnel syndrome.

25

Q. Is that on both hands or both

1 GILADI

2 arms?

3 A. On both hands.

4 Q. Do you see Dr. Goldstein for any
5 other problems?

6 A. No. He does also examination
7 for my back sometime when I go to him.

8 Q. For your what?

9 A. My back.

10 Q. What treatment does he give to
11 your back?

12 MR. DINHOFER: We went through
13 this at the first deposition. The back is
14 unrelated to this.

15 THE WITNESS: It is not related
16 to the notes.

17 MR. DINHOFER: I understand. It
18 is not related to the notes.

19 MS. ATLAS: Let's go to the next
20 note.

21 MR. DINHOFER: Actually, it is
22 12:59, and I have to go. I have to get
23 some lunch and get to court.

24 MS. ATLAS: That is fair. When
25 do you want to continue this?

1 GILADI

2 MR. DINHOFER: We will continue
3 it and reschedule it.

4 MS. ATLAS: Do you want to tell
5 me any possibilities because if I have my
6 people set up, I don't want to screw up.

7 MR. DINHOFER: Nobody has been
8 set up.

9 MS. ATLAS: I thought we had a
10 date for Strauch.

11 MR. DINHOFER: They didn't
12 notify us of a date.

13 MS. ATLAS: I want to do it as
14 fast as possible. Call my EBT clerk.

15 MR. DINHOFER: All right.

16 (Continued on the next page.)

17

18

19

20

21

22

23

24

25

1 GILADI

2 MS. ATLAS: I am pretty

3 flexible.

4 MR. DINHOFER: We will take care
5 of it.

6 (Time noted: 1:00 p.m.)

7

8

9

10 RONI GILADI

11

12 Subscribed and sworn to before me

13 this ____ day of _____, 1996

14

15

16

17

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23

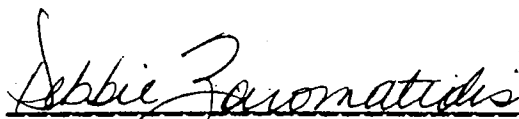
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C E R T I F I C A T I O N

I, DEBBIE ZAROMATIDIS, a Shorthand Reporter
and Notary Public of the State of New York, do
hereby certify that the foregoing
witness, R O N I G I L A D I ,
was duly sworn on the date indicated, and that
the foregoing is a true and accurate
transcription of my stenographic notes.

I further certify that I am not employed by
nor related to any party to this action.


DEBBIE ZAROMATIDIS

1

2

E X H I B I T S

3

4

DEFENDANTS'

5

EXHIBITDESCRIPTIONPAGE

6

A1

Handwrittten notes

3

7

A2

Handwrittten notes

3

8

A3

Handwrittten notes

3

9

B

Packet of documents

3

10

B1

Copy of A3

7

11

B2

Copy of A1

8

12

B3

Copy of A2

8

13

C1

Photograph

3

14

C2

Photograph

3

15

C3

Photograph

16

D1

Handwritten note 3/91

57

17

D2

Handwritten note 7/19/91

64

18

D3

Handwritten note 7/31/91

68

19

D4

Handwritten note

74

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LITIGATION SUPPORT INDEX

DIRECTION TO WITNESS NOT TO ANSWER

Page	Line	Page	Line
			(None)

REQUEST FOR PRODUCTION OF DOCUMENTS

Page	Line	Page	Line
51	22	54	10

INFORMATION TO BE FURNISHED

Page	Line	Page	Line
			(None)

QUESTIONS MARKED FOR A RULING

Page	Line	Page	Line
			(None)